

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:  
THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 23752 and 23753.

**MOTION SUBMITTING REVISED PROPOSED ORDERS GRANTING THE (I) FIVE  
HUNDRED FIFTIETH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF  
THE PUERTO RICO ELECTRIC POWER AUTHORITY TO DUPLICATE  
BOND CLAIMS AND (II) FIVE HUNDRED FIFTY-FIRST OMNIBUS OBJECTION  
(NON-SUBSTANTIVE) OF THE PUERTO RICO ELECTRIC POWER AUTHORITY  
TO DUPLICATIVE BOND CLAIMS**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Puerto Rico Electric Power Authority (“PREPA”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability*

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

*Act* (“PROMESA”),<sup>2</sup> respectfully submits this motion submitting revised proposed orders and accompanying exhibits in connection with the (1) *Five Hundred Fiftieth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Duplicate Bond Claims* [ECF No. 22737] (the “Five Hundred Fiftieth Omnibus Objection”), and (2) *Five Hundred Fifty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Duplicate Bond Claims* [ECF No. 22738] (the “Five Hundred Fifty-First Omnibus Objection,” and together with the Five Hundred Fiftieth Omnibus Objection, the “Omnibus Objections”).

1. On October 28, 2022, PREPA, by and through the Oversight Board, filed the Omnibus Objections.

2. Thereafter, on December 9, 2022, various debtors, including PREPA, by and through the Oversight Board, filed a notice to withdraw, without prejudice, various omnibus objections as to certain claims [ECF No. 23036] (the “Notice of Withdrawal”).

3. Specifically, pursuant to the Notice of Withdrawal, PREPA withdrew, without prejudice, (1) the Five Hundred Fiftieth Omnibus Objection, solely with respect to Proof of Claim Nos. 30888 and 22078, and (2) the Five Hundred Fifty-First Omnibus Objection, solely with respect to Proof of Claim No. 31087 (collectively, the “Withdrawn Claims”).

4. On January 25, 2023, PREPA, by and through the Oversight Board, filed notices of presentment for the Omnibus Objections [ECF Nos. 23365 and 23366] (the “Notices of Presentment”). Upon further review, the Notices of Presentment did not attach revised exhibits reflecting the withdrawal of the Omnibus Objections as to the Withdrawn Claims.

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

5. Subsequently, on March 8, 2023, the Court granted the Omnibus Objections [ECF Nos. 23752 and 23753] and the Withdrawn Claims were inadvertently expunged from PREPA's Title III claims register.

6. Accordingly, to correct the record and reinstate the Withdrawn Claims on PREPA's Title III claims register, attached hereto as **Exhibit 1** and **Exhibit 2** are amended and restated proposed orders and accompanying revised exhibits (the "**Revised Proposed Orders**") for the Omnibus Objections reflecting the withdrawal of the Omnibus Objections as to the Withdrawn Claims.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of this filing and enter the Revised Proposed Orders granting the Omnibus Objections.

Dated: April 24, 2023  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Ricardo Burgos Vargas  
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Management Board for Puerto Rico, as  
representative for the Puerto Rico Electric  
Power Authority*

**Exhibit 1**

**Amended and Restated Proposed Order Granting  
Five Hundred Fiftieth Omnibus Objection**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA.

**AMENDED AND RESTATED<sup>2</sup> [PROPOSED] ORDER GRANTING FIVE HUNDRED  
FIFTIETH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY TO DUPLICATIVE BOND CLAIMS**

Upon the *Five Hundred Fiftieth Omnibus Objection (Non-Substantive) of the  
Puerto Rico Electric Power Authority to Duplicative Bond Claims* (the “Five Hundred Fiftieth”

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> This Order amends and restates the *Order Granting Five Hundred Fiftieth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Duplicative Bond Claims* (Docket Entry No. 23752) to note PREPA’s withdrawal, without prejudice, of the Five Hundred Fiftieth Omnibus Objection to Proof of Claim Nos. 30888 and 22078. (See Docket Entry No. 23036.)

Omnibus Objection”)<sup>3</sup> of the Puerto Rico Electric Power Authority (“PREPA”), dated October 28, 2022, for entry of an order disallowing certain claims filed against PREPA, as more fully set forth in the Five Hundred Fiftieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Fiftieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Fiftieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in Exhibit A hereto (collectively, the “Duplicative Bond Claims”) asserting a duplicative claim, as set forth in Exhibit A hereto; and the Court having determined that the relief sought in the Five Hundred Fiftieth Omnibus Objection is in the best interest of PREPA and its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Fiftieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Fiftieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Duplicative Bond Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk (now Kroll Restructuring Administration LLC) is authorized and directed to delete the Duplicative Bond Claims from the official claims register in the Title III Cases; and it is further

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<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Fiftieth Omnibus Objection.

ORDERED that this Order resolves Docket Entry No. 22737 in Case No. 17-3283;  
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters  
arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**Exhibit A**

**Schedule of Claims Subject to the Five Hundred Fiftieth Omnibus Objection**



**Exhibit 2**

**Amended and Restated Proposed Order Granting  
Five Hundred Fifty-First Omnibus Objection**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA.

**AMENDED AND RESTATED<sup>2</sup> [PROPOSED] ORDER GRANTING FIVE HUNDRED  
FIFTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE PUERTO  
RICO ELECTRIC POWER AUTHORITY TO DUPLICATIVE BOND CLAIMS**

Upon the *Five Hundred Fifty-First Omnibus Objection (Non-Substantive) of the  
Puerto Rico Electric Power Authority to Duplicative Bond Claims* (the “Five Hundred Fifty-First”

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> This Order amends and restates the *Order Granting Five Hundred Fifty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Duplicative Bond Claims* (Docket Entry No. 23753) to note PREPA’s withdrawal, without prejudice, of the Five Hundred Fifty-First Omnibus Objection to Proof of Claim No. 31087. (See Docket Entry No. 23036.)

Omnibus Objection”)<sup>3</sup> of the Puerto Rico Electric Power Authority (“PREPA”), dated October 28, 2022, for entry of an order disallowing certain claims filed against PREPA, as more fully set forth in the Five Hundred Fifty-First Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Fifty-First Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Fifty-First Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in Exhibit A hereto (collectively, the “Duplicative Bond Claims”) asserting a duplicative claim, as set forth in Exhibit A hereto; and the Court having determined that the relief sought in the Five Hundred Fifty-First Omnibus Objection is in the best interest of PREPA and its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Fifty-First Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Fifty-First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Duplicative Bond Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk (now Kroll Restructuring Administration LLC) is authorized and directed to delete the Duplicative Bond Claims from the official claims register in the Title III Cases; and it is further

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<sup>3</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Fifty-First Omnibus Objection.

ORDERED that this Order resolves Docket Entry No. 22738 in Case No. 17-3283;  
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters  
arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**Exhibit A**

**Schedule of Claims Subject to the Five Hundred Fifty-First Omnibus Objection**